

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JAMES E. SHELTON, ) Judge Christopher A. Boyko  
Plaintiff, )  
v. ) Case No. 1:19-cv-01205  
BLINDBID INC., dba TCPA LITIGATOR )  
LIST, et al. ) **DEFENDANTS' UNOPPOSED MOTION**  
Defendants, ) **FOR EXTENSION OF TIME TO FILE**  
\_\_\_\_\_) **OPPOSITION TO PLAINTIFF'S**  
\_\_\_\_\_) **MOTION TO REMAND AND FOR**  
\_\_\_\_\_) **SANCTIONS**

Defendants, Blindbid Inc. (“Blindbid”) and Michael O’Hare (“O’Hare”) (collectively, “Defendants”), move this Court for a seven (7) day extension, until July 22, 2019, to respond to Plaintiff, James E. Shelton’s (“Plaintiff”), Motion to Remand and for Sanctions [Doc. 8]. This motion is requested for the reason that undersigned counsel was out of the office on a preplanned family vacation during the preceding holiday week and due to the press of other business. In addition, the parties have been engaged in settlement discussions. Plaintiff’s counsel, Bryan Reo, was contacted regarding this Motion and he indicated he has no objection to the brief extension requested herein. Defendants submit that no party will be prejudiced by a granting on the brief extension requested herein. This Motion is not interposed for purposes of delay, but rather, in the interests of justice and hopeful preservation of the parties’ and this Court’s limited time and resources.

WHEREFORE, for good cause shown, Defendants, Blindbid Inc. (“Blindbid”) and Michael O’Hare (“O’Hare”) (collectively, “Defendants”), move this Court for a seven (7) day

extension, until July 22, 2019, to respond to Plaintiff, James E. Shelton’s (“Plaintiff”), Motion to Remand and for Sanctions [Doc. 8].

Respectfully submitted,

DINN, HOCHMAN & POTTER, LLC

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2019, the foregoing Unopposed Motion for Extension of Time to File Opposition to Plaintiff’s Motion to Remand and for Sanctions was filed electronically through the Court’s electronic filing system. Notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s electronic filing system.

DINN, HOCHMAN & POTTER, LLC

/s/ Benjamin D. Carnahan  
BENJAMIN D. CARNAHAN (0079737)  
*Attorneys for Defendants*